

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re MERIDIAN FUNDS GROUP : No. 09-md-2082
SECURITIES & EMPLOYEE RETIREMENT :
INCOME SECURITY ACT (ERISA) : LEAD COUNSEL'S NOTICE OF MOTION
LITIGATION : AND MOTION FOR AN AWARD OF
: ATTORNEYS' FEES AND EXPENSES

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that Robbins Geller Rudman & Dowd LLP, Court-appointed Lead Counsel and counsel for Plaintiff Pension Trust Fund for Operating Engineers, will move this Court on September 7, 2016, at 2:00 p.m., before the Honorable Thomas P. Griesa, for entry of an order, pursuant to Rules 23 and 54 of the Federal Rules of Civil Procedure: (1) awarding attorneys' fees; and (2) paying litigation expenses incurred in prosecuting the litigation. This motion is based on: (i) the Memorandum of Law in Support of Lead Counsel's Motion for an Award of Attorneys' Fees and Expenses; (ii) the Declaration of David A. Rosenfeld in Support of Plaintiff's Motion for Final Approval of Settlement and Plan of Allocation and Lead Counsel's Motion for an Award of Attorneys' Fees and Expenses; (iii) the Declaration of Maggie McGill; (iv) the Declarations of Plaintiff's counsel; (v) the Settlement Agreement; and (vi) all other proceedings herein.

A proposed order will be submitted with Lead Counsel's reply submission on or before August 31, 2016.

DATED: August 3, 2016

Respectfully submitted,

**ROBBINS GELLER RUDMAN
& DOWD LLP
ELLEN GUSIKOFF STEWART**

s/ Ellen Gusikoff Stewart
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Additional Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on August 3, 2016, I caused the foregoing Lead Counsel's Notice of Motion and Motion for an Award of Attorneys' Fees and Expenses to be served electronically on all ECF participants.

s/ Ellen Gusikoff Stewart

ELLEN GUSIKOFF STEWART